

REMARKS

Applicant wishes to thank the Examiner for the interview on October 12, 2005 concerning the cited references and pending claims, and for the Examiner's indication that the Examiner was willing to consider a Response After Final. Applicant respectfully requests entry of this Response After Final into the pending case. Claims 1 and 3-34 are pending. Claims 1, 3, 4, 18, 20, 23, 25, 27 and 32 are amended, claim 2 is cancelled, and claim 34 is added. In view of the following, Applicant respectfully requests reconsideration.

Rejections Under 35 U.S.C. §112

The Office has rejected claim 23 under 35 U.S.C. §112, second paragraph, as lacking a proper antecedent basis. Claim 23 has been amended to recite "said base coupling portion" and "said sleeve coupling portion." Applicant respectfully asserts that claim 23, as amended, properly refers to the "base coupling portion" and the "sleeve coupling portion" recited in claim 18, upon which claim 23 depends, and does not lack a proper antecedent basis.

Claim 27 has been rejected under 35 U.S.C. §112, second paragraph, as lacking a proper antecedent basis. Claim 27 has been amended to change "the first diameter" to "said first diameter," which properly refers to "a first diameter" as recited in claim 25, upon which claim 27 depends. Applicant respectfully asserts that claim 27, as amended, does not lack a proper antecedent basis.

Rejections Under 35 U.S.C. §102

Claim 1 has been rejected under 35 U.S.C. §102(b) as being anticipated by Lathrop (U.S. Patent No. 5,520,582). Applicant respectfully traverses and asserts that Lathrop does not disclose all elements as recited in claim 1, as amended. For example, claim 1, as amended, recites, "one of said sleeve coupling portion and said base coupling portion has an outer diameter

that rotatably engages the other of said sleeve coupling portion and said base coupling portion.” In contrast, plug 12 and sleeve 30, 32, 34, 36 (hereinafter “sleeve 30”) of Lathrop does not have an outer diameter that rotatably engages the other of plug 12 or sleeve 30. Additionally, Lathrop discloses that plug 12 has a straight cylindrical guide pin 24 and sleeve 30 has a cylindrical recess 46 for snugly receiving guide pin 44. Guide pin 24 prevents plug 12 from rotating sleeve 30. There is no motivation in Lathrop to remove guide pin 24.

As another example, claim 1, as amended, recites “a base [that] includes an integral coupling portion ... and a one-piece sleeve with an integral coupling portion ... wherein ... one of said sleeve coupling portion and said base coupling portion ... rotatably engages the other of said sleeve coupling portion and said base coupling portion.” In contrast, in Lathrop plug 12 does not engage sleeve 30, instead each of plug 12 and sleeve 30 separately engage bolt 70. In view of the above, Applicant respectfully asserts that claim 1, as amended, is allowable under 35 U.S.C. § 102(b) over Lathrop. Claims 3-17 and 34 are dependent upon claim 1 and allowable for at least this reason.

The Office has rejected claim 18 under 35 U.S.C. §102(b) as being anticipated by Goldman (U.S. Patent No. 5,118,106). Applicant has amended claim 18 and respectfully traverses. Goldman does not disclose all elements recited in claim 18, as amended. For example, claim 18 states, “said sleeve has a diameter substantially equal to said base diameter.” Conversely, Goldman discloses an insert 34, 36, 38 with a diameter that is not substantially equal to the diameter of sleeves 20, 22, 24. As such, claim 18, as amended, is patentable under 35 U.S.C. §102(b) in view of Goldman. Claims 19-24 are dependent upon claim 18 and allowable for at least this reason.

Applicant further asserts that claim 18, as amended, is patentable under 35 U.S.C. § 102 in view of Lathrop. For example, claim 18, as amended, recites “one of said sleeve coupling portion and said base coupling portion has an outer diameter which is threadably engaged to an inner diameter of the other of said sleeve coupling portion and said base coupling portion.” In contrast, neither of plug 12 and sleeve 30 has an outer diameter which is threadably engaged to an inner diameter of the other of plug 12 and sleeve 30. Furthermore, Lathrop discloses that guide pin 44 prevents plug 12 from threadably engaging sleeve 30, as noted above, and there is no motivation in Lathrop to remove guide pin 44.

Claim 25 has also been rejected under 35 U.S.C. §102(b) as being anticipated by Lathrop. Applicant respectfully traverses and asserts that Lathrop does not disclose all elements recited in claim 25, as amended. For example, claim 25 states that “said engaging is accomplished by the threading of the base coupling portion meshing with the threading of the sleeve coupling portion.” In contrast, as discussed above, Lathrop discloses that threaded bores 22 and 44, and guide pin 24 prevent plug 12 from meshing with sleeve 30 as described by claim 1. Furthermore, there is no motivation in Lathrop to remove guide pin 24. As such, Applicant respectfully asserts that claim 25 is patentable under 35 U.S.C. §102(b) in view of Lathrop. Claims 26-31 are dependent on claim 25 and allowable for at least this reason.

The Office has also rejected claim 32 under 35 U.S.C. §102(b) as being anticipated by Lathrop. Applicant respectfully traverses and asserts that Lathrop does not disclose all elements recited in claim 32, as amended. For example, claim 32 recites, “a base [that] includes an integral threaded portion [and] a sleeve with an integral threaded portion, ... wherein said sleeve threaded portion is rotatably engaged to said base threaded portion.” As mentioned above, Lathrop discloses that a guide pin 24 prevents plug 12 from rotatably engaging sleeve 30, in

contrast to the language of claim 32. Furthermore, there is no motivation to remove guide pin 24.

As another example, claim 32, as amended, includes "a locking member which is threaded and engaged with said base locking portion and further engaged with said sleeve locking portion" wherein "said sleeve locking portion is offset from said [sleeve] centerline." In contrast, Lathrop discloses that guide pin 24 is not threaded and that bolt 70 is extended through axial threaded bores 22 and 44, which are located on the centerline of plug 12 and sleeve 30. As such, Applicant respectfully asserts that claim 32 is patentable in view of Lathrop. Claim 33 is dependent upon claim 32 and allowable for at least this reason.

Applicant further asserts that the present invention is distinguishable from the remaining cited art, such as U.S. Patent No. 4,247,102 to Seyler. For example, Seyler does not disclose a structure that includes a base and a sleeve with substantially equal outer diameters similar to that recited in claims 1, 18 and 32, as amended. In contrast, Seyler discloses that each of its various components have different outer diameters. *See, e.g.*, Seyler, FIGs. 4 and 6, reproduced in Figure 1 (depicting cylindrical main body 14

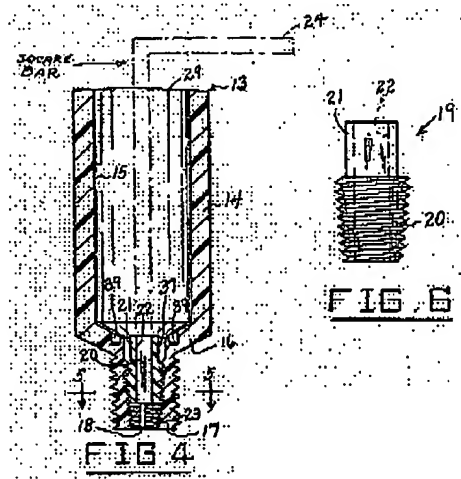


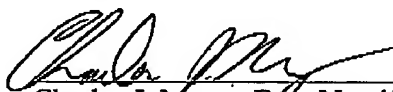
Figure 1
Seyler (US 4,247,102)

with integral axial stud 17, and a separate locking screw member 19). As another example, Seyler does not disclose a base portion mountable inside a hole and a sleeve portion that engages the base portion similar to that recited in claims 1, 18, 25 and 32, as amended. Instead, Seyler discloses that a portion of insert 13—axial stud 17—is threadedly received by bottom hole 28. Seyler further discloses that locking screw member 19, which does not resemble a sleeve, is

threadedly engaged within the internal threads 23 of stud 17. Additionally, even if Seyler disclosed structures similar to that recited in the pending claims, there is no motivation to combine Seyler with the other cited references, such as Lathrop or Goldman.

In summary, Applicant respectfully asserts that claims 1 and 3-34, as currently presented, are allowable and respectfully requests the Examiner to enter this amendment and move this case toward issuance. The Examiner is invited to contact the undersigned directly if it would be helpful to the advancement of this case.

Respectfully submitted,



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